

DISTRICT ATTORNEY KINGS COUNTY

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> [INSERT NAME] Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]

Kings County Dkt./Ind. No. [#######]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: NAQUON GURLEY

MOS TAX:

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move <u>in limine</u> to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

MOS GURLEY ENTERED A PLEA OF GUILTY TO THE FOLLOWING DEPARTMENTAL CHARGES WHILE MOS GURLEY WAS ASSIGNED TO TRANSIT DISTRICT #30:

ALLEGATIONS:

- MOS GURLEY, WHILE OFF-DUTY, ON OR ABOUT DECEMBER 10, 2006, IN NEW YORK COUNTY, HAVING BEEN INVOLVED IN A POLICE INCIDENT TO WIT: A TRAFFIC DISPUTE DURING WHICH SAID MOS DREW OFF HIS OFF-DUTY FIREARM, DID THEREAFTER FAIL AND NEGLECT TO REPORT SAID INCIDENT TO THIS COMMANDING OFFICER AS REQUIRED.
- MOS GURLEY, ON OR ABOUT DECEMBER 11, 2007 [sic], WAS WRONGFULLY IN POSSESSION OF AN UNAUTHORIZED DUPLICATE NEW YORK CITY POLICE DEPARTMENT SHIELD WITHOUT PERMISSION OR AUTHORITY TO DO SO.

CASE STATUS: CLOSED ON 07/15/2009

ACTION TAKEN: FORFEITURE OF TWENTY (20) VACATION DAYS

Disclosure # 2:

THE NYPD PARTIALLY SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 02/28/2009, AGAINST MOS GURLEY:

ALLEGATION(S):

1. DEPARTMENT RULES VIOLATION - OTHER

CASE STATUS: CLOSED ON 02/23/2010

ACTION TAKEN: SCHEDULE A COMMAND DISCIPLINE

Disclosure # 3:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 03/15/2016, AGAINST MOS GURLEY: ALLEGATION(S):

- 1. OFF DUTY EMPLOYMENT UNAUTHORIZED
- 2. MEMOBOOK INCOMPLETE/IMPROPER

3. MEMOBOOK INCOMPLETE/IMPROPER

CASE STATUS: CLOSED ON 08/08/2017

ACTION TAKEN: SCHEDULE B COMMAND DISCIPLINE

Disclosure # 4:

MOS GURLEY PLED GUILTY TO THE FOLLOWING NYPD DISCIPLINARY CHARGES ARISING FROM AN NYPD INTEGRITY TEST:

ALLEGATIONS:

- 1. MOS GURLEY, WHILE ON-DUTY AND ASSIGNED TO TRANSIT BUREAU DISTRICT 30, ON OR ABOUT OCTOBER 9, 2015, AT A LOCATION KNOWN TO THE DEPARTMENT IN KINGS COUNTY, PLACED AN INDIVIDUAL UNDER ARREST WITHOUT REASONABLE CAUSE.
- 2. MOS GURLEY, WHILE ON-DUTY AND ASSIGNED TO TRANSIT BUREAU DISTRICT 30, ON OR ABOUT OCTOBER 9, 2015, IN KINGS COUNTY, MADE FALSE AND/OR INACCURATE SWORN STATEMENTS IN A DESK APPEARANCE TICKET EXPRESS REPORT CONCERNING HIS OBSERVATIONS OF A CRIME.

CASE STATUS: CLOSED ON 12/19/2016

ACTION TAKEN: FORFIETURE OF TWENTY (20) VACATION DAYS

Disclosure # 5:

MOS GURLEY ENTERED A PLEA OF GUILTY TO THE FOLLOWING DEPARTMENTAL CHARGES WHILE MOS GURLEY WAS ASSIGNED TO TRANSIT DISTRICT 30:

ALLEGATIONS:

- 1. MOS GURLEY, ON OR ABOUT AND BETWEEN APRIL 25, 2015 AND MAY 22, 2016, PERFORMED UNAUTHORIZED OFF-DUTY EMPLOYMENT FOR A COMPANY KNOWN TO THE DEPARTMENT AT A LOCATION KNOWN TO THE DEPARTMENT.
- 2. MOS GURLEY, ON OR ABOUT AND BETWEEN MAY 3, 2015 AND MAY 4, 2016, IN BRONX COUNTY, ON MULTIPLE OCCASIONS PERFORMED OFF-DUTY EMPLOYMENT FOR A COMPANY KNOWN TO THE DEPARTMENT IN EXCESS OF TWENTY (20) HOURS PER WEEK.
- 3. MOS GURLEY, ON OR ABOUT AND BETWEEN AUGUST 14, 2015 AND MAY 12, 2016, IN BRONX COUNTY, ON MULTIPLE OCCASIONS PERFORMED OFF-DUTY EMPLOYMENT FOR A COMPANY KNOWN TO THE DEPARTMENT LESS THAN THREE (3) HOURS IMMEDIATELY PRIOR TO HIS REGULAR TOUR OF DUTY.
- 4. MOS GURLEY, ON OR ABOUT AND BETWEEN JULY 26, 2015 AND MAY 4, 2016, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: ON MULTIPLE OCCASIONS MOS GURLEY SCHEDULED AND/OR PERFORMED HIS OFF-DUTY EMPLOYMENT FOR A COMPANY KNOWN TO THE DEPARTMENT WITHIN REGULAR HOURS OF POLICE DUTIES TO WHICH HE WAS ASSIGNED.
- 5. MOS GURLEY, ON OR ABOUT APRIL 7, 2016, IN KINGS COUNTY, CAUSED A FALSE AND/OR INACCURATE ENTRY TO BE MADE IN ONE OR MORE DEPARTMENT RECORDS, TO WIT: SAID MOS MARKED HIMSELF PRESENT FOR DUTY AT 2320 HOURS.
- 6. MOS GURLEY, ON OR ABOUT AND BETWEEN SEPTEMBER 25, 2015 AND MAY 4, 2016, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: ON ONE OR MORE OCCASIONS MOS GURLEY ENGAGED IN OFF-DUTY EMPLOYMENT FOR A COMPANY KNOWN TO THE DEPARTMENT DURING AN OVERTIME ASSIGNMENT.

CASE STATUS: CLOSED ON 07/06/2018

ACTION TAKEN: PLACED ON DISMISSAL PROBATION FOR ONE (1) YEAR AND FORFEITURE OF TWENTY (20) VACATION DAYS

Disclosure # 6:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 09/18/2019, AGAINST MOS GURLEY: ALLEGATION(S):

- 1. MISSING DEPARTMENT EQUIPMENT DEPARTMENT CELLULAR PHONE
- 2. FAIL TO SAFEGUARD DEPARTMENT EQUIPMENT ID CARD ACTIVE

CASE STATUS: CLOSED ON 10/17/2019

ACTION TAKEN: SCHEDULE A COMMAND DISCIPLINE

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez District Attorney Kings County